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October 23, 2014

**VIA ECF**

Hon. Valerie E. Caproni  
U.S. District Court  
40 Foley Square  
New York, NY 10007

Re: *Adkins et al. v. Morgan Stanley et al.*, No. 1:12-cv-7667 (VEC) (GWG)

Dear Judge Caproni,

I represent the Plaintiffs in this civil rights action. Pursuant to the Court's October 2, 2014 Order (ECF 185) ("the Order"), I write to publicly file the documents previously filed under seal or in substantially redacted form in support of Plaintiffs' motion for class certification. *See* ECF Nos. 128-132. The documents submitted with this letter contain the limited redactions referenced in the Order. The attached appendix indicates how each of the exhibits submitted herewith corresponds to documents previously filed under seal or in substantially redacted form.

Sincerely,

Laurence M. Schwartztol

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## Appendix 1

<b>Exhibit to this Filing:</b>	<b>Docket Number of Corresponding Document Provisionally Filed Under Seal or in Substantially Redacted Form:</b>	<b>Document Name:</b>
Exhibit 1	ECF 128	Plaintiffs' Memorandum in Support of Motion for Class Certification.
Exhibit 2	ECF 129, Ex. 1	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 1: Excerpts from New Century 10-K, 12/31/2004).
Exhibit 3	ECF 129, Ex. 2	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 2: New Century Discussion Materials, 11/2004).
Exhibit 4	ECF 129, Ex. 3	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 3: Warehouse Financing Proposal Review, 09/2004).
Exhibit 5	ECF 129, Ex. 4	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 4: W. Licata Deposition Excerpts, 06/19/2014).
Exhibit 6	ECF 129, Ex. 5	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 5: Warehouse Financing Proposal Review, 06/30/2004).
Exhibit 7	ECF 129, Ex. 6	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 6: E-mail from A. Neuberger, 10/24/2006).
Exhibit 8	ECF 129, Ex. 7	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 7: E-mail from C. Phillips, 11/23/2004).

Exhibit 9	ECF 129, Ex. 8	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 8: C. Phillips Deposition Excerpts, 05/28/2014).
Exhibit 10	ECF 129, Ex. 9	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 9: E-mail from C. Phillips, 11/23/2004).
Exhibit 11	ECF 129, Ex. 10	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 10: E-mail from A. Lee, 04/08/2005).
Exhibit 12	ECF 129, Ex. 11	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 11: Document titled Project Tiger, 09/10/2004).
Exhibit 13	ECF 129, Ex. 12	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 12: E-mail from A. Neuberger, 11/08/2004).
Exhibit 14	ECF 129, Ex. 13	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 13: B. Davis Deposition Excerpts, 02/25/2014).
Exhibit 15	ECF 129, Ex. 14	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 14: A. Peterson Deposition Excerpts, 02/27/2014).
Exhibit 16	ECF 129, Ex. 15	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 15: K. Gilly FHFA Deposition Excerpts, 07/15/2014).
Exhibit 17	ECF 129, Ex. 16	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 16: E-mail from C. Phillips, 01/05/2005).
Exhibit 18	ECF 129, Ex. 17	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 17: E-mail from B. Davis, 01/05/2004).
Exhibit 19	ECF 129, Ex. 18	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 18: Excerpts from New Century 8-K, 03/02/2007).

Exhibit 20	ECF 129, Ex. 19	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 19: A. Neuberger Deposition Excerpts, 05/05/2014).
Exhibit 21	ECF 129, Ex. 20	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 20: New Century 8-K/A, 03/13/2007).
Exhibit 22	ECF 129, Ex. 21	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 21: Bankruptcy Examiner Interview of P. Dodge, (01/11/2008).
Exhibit 23	ECF 129, Ex. 22	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 22: P. Lindsay Deposition Excerpts, 04/02/2014).
Exhibit 24	ECF 129, Ex. 23	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 23: S. Shapiro Deposition Excerpts, 04/02/2014).
Exhibit 25	ECF 129, Ex. 24	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 24: F. Telesca Deposition Excerpts, 04/03/2014).
Exhibit 26	ECF 129, Ex. 25	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 25: E-mail from V Vanacker, 12/07/2005).
Exhibit 27	ECF 129, Ex. 26	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 26: E-mail from F. Telesca, 11/07/2005).
Exhibit 28	ECF 129, Ex. 27	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 27: K. Cloyd Deposition Excerpts, 04/04/2014).
Exhibit 29	ECF 129, Ex. 28	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 28: Bankruptcy Examiner Interview of B. McKay, 01/29/2008).
Exhibit 30	ECF 129, Ex. 29	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 29: Bankruptcy Examiner Interview of D. Lange, 01/25/2008).

Exhibit 31	ECF 129, Ex. 30	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 30: Bankruptcy Examiner Interview of P. Zalle, 11/17/2007).
Exhibit 32	ECF 129, Ex. 31	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 31: Bankruptcy Examiner Interview of P. Flanigan, 11/21/2007).
Exhibit 33	ECF 129, Ex. 32	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 32: Bankruptcy Examiner Interview of S. Lemon, 10/07/2007).
Exhibit 34	ECF 129, Ex. 33	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 33: E-mail from S. Shapiro, 01/28/2005).
Exhibit 35	ECF 129, Ex. 34	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 34: E-mail from R. Mocco with attached Warehouse Lending Procedures, 03/08/2005).
Exhibit 36	ECF 129, Ex. 35	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 35: Warehouse Financing Proposal Review, 11/16/2005).
Exhibit 37	ECF 129, Ex. 36	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 36: D. Goodman Deposition Excerpts, 03/07/2014).
Exhibit 38	ECF 129, Ex. 37	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 37: E-mail from A. Neuberger, 03/28/2005).
Exhibit 39	ECF 129, Ex. 38	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 38: Master Loan and Security Agreement, 03/01/2005).
Exhibit 40	ECF 129, Ex. 39	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 39: Master Repurchase Agreement, 04/19/2006).
Exhibit 41	ECF 129, Ex. 40	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 40: E-mail from S. Shapiro, 04/17/2006).

Exhibit 42	ECF 129, Ex. 41	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 41: Warehouse Lending Group Procedures Manual 2006).
Exhibit 43	ECF 129, Ex. 42	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 42: E-mail from A. Neuberger, 08/29/2005).
Exhibit 44	ECF 129, Ex. 43	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 43: E-mail from R. Travis, 03/21/2007).
Exhibit 45	ECF 129, Ex. 44	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 44: V. Vanacker Deposition Excerpts, 03/12/2014).
Exhibit 46	ECF 129, Ex. 45	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 45: E. Kaplan Deposition Excerpts, 03/14/2014).
Exhibit 47	ECF 129, Ex. 46	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 46: New Century Capital Corporation Bid Terms, 03/2006).
Exhibit 48	ECF 129, Ex. 47	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 47: E-mail from S. Shapiro, 08/30/2004).
Exhibit 49	ECF 129, Ex. 48	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 48: E-mail from V. Vanacker, 11/24/2004).
Exhibit 50	ECF 129, Ex. 49	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 49: E-mail from A. Peterson, 10/21/2005).
Exhibit 51	ECF 129, Ex. 50	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 50: E-mail from E. Garrison, 09/25/2006).
Exhibit 52	ECF 129, Ex. 51	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 51: E-mail from L. Del Rio, 01/10/2007).

Exhibit 53	ECF 129, Ex. 52	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 52: E-mail from P. Barrow, 05/25/2006).
Exhibit 54	ECF 129, Ex. 53	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 53: E-mail from K. Gilly, 04/21/2005).
Exhibit 55	ECF 129, Ex. 54	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 54: E-mail from P. Barrow, 03/29/2006).
Exhibit 56	ECF 129, Ex. 55	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 55: E-mail from M. Atadika, 12/08/2005).
Exhibit 57	ECF 129, Ex. 56	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 56: P. Barrow Deposition Excerpts, 06/02/2014).
Exhibit 58	ECF 129, Ex. 57	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 57: New Century Interoffice Memorandum, 02/12/2004).
Exhibit 59	ECF 129, Ex. 58	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 58: E-mail from B. Davis, 09/30/2004).
Exhibit 60	ECF 129, Ex. 59	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 59: Morgan Stanley Bulk Due Diligence Procedures, 12/13/2007).
Exhibit 61	ECF 129, Ex. 60	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 60: Morgan Stanley Mortgage Appraisal Review System PowerPoint).
Exhibit 62	ECF 129, Ex. 61	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 61: E-mail from T. Smith, 03/30/2006).
Exhibit 63	ECF 129, Ex. 62	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 62: E-mail from S. Shapiro, 10/04/2005).



Exhibit 64	ECF 129, Ex. 63	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 63: E-mail from K. Weiss, 01/26/2007).
Exhibit 65	ECF 129, Ex. 64	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 64: E-mail from B. Davis, 11/01/2006).
Exhibit 66	ECF 129, Ex. 65	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 65: E-mail from K. Gilly with Final Tieout Summary attachment, 02/21/2007).
Exhibit 67	ECF 129, Ex. 66	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 66: E-mail from P. Barrow, 11/16/2006).
Exhibit 68	ECF 129, Ex. 67	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 67: E-mail from B. Pearson, 08/11/2004).
Exhibit 69	ECF 129, Ex. 68	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 68: B. Adkins New Century Loan, 04/28/2004).
Exhibit 70	ECF 129, Ex. 69	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 69: C. Williams New Century Loan, 04/22/2005).
Exhibit 71	ECF 129, Ex. 70	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 70: R. Pettway New Century Loan, 05/13/2004).
Exhibit 72	ECF 129, Ex. 71	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 71: R. McCoy New Century Loan, 07/31/2006).
Exhibit 73	ECF 129, Ex. 72	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 72: W. Young New Century Loan, 11/03/2005).
Exhibit 74	ECF 129, Ex. 73	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 73: C. Williams New Century Loan, 05/09/2003).



Exhibit 75	ECF 129, Ex. 74	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 74: B. Adkins Deposition Excerpts, 03/19/2014).
Exhibit 76	ECF 129, Ex. 75	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 75: R. Pettaway Deposition Excerpts, 03/18/2014).
Exhibit 77	ECF 129, Ex. 76	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 76: R. McCoy Deposition Excerpts, 03/17/2014).
Exhibit 78	ECF 129, Ex. 77	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 77: C. Williams Deposition Excerpts, 03/19/2014).
Exhibit 79	ECF 129, Ex. 78	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 78: W. Young Deposition Excerpts, 03/18/2014).
Exhibit 80	ECF 129, Ex. 79	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 79: B. Adkins Appraisal).
Exhibit 81	ECF 129, Ex. 80	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 80: C. Williams Appraisal).
Exhibit 82	ECF 129, Ex. 81	Declaration of Nicole D. Sugnet in Support of Plaintiffs' Motion for Class Certification (Ex. 81: W. Young Appraisal).
Exhibit 83	ECF 130	Expert Opinion of Patricia A. McCoy in Support of Class Certification.
Exhibit 84	ECF 131	Expert Opinion of Ian Ayres in Support of Class Certification.
Exhibit 85	ECF 132	Expert Opinion of Geoffery A. Oliver in Support of Class Certification.